

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) CRIMINAL NO.: 04-10146-WGY
)
)
) VIOLATIONS:
)
ROBERT RAMOS) 18 U.S.C. § 1958 - Use of
) Interstate Commerce Facilities
) In The Commission of Murder-
) For-Hire
) 18 U.S.C. § 1958 - Interstate
) Travel In The Commission Of
) Murder-For-Hire
) 18 U.S.C. § 2 - Aiding and
) Abetting

SUPERSEDING INFORMATION

COUNT ONE: >Title 18, United States Code, Section 1958 - Use
 of Interstate Commerce Facilities In The
 Commission of Murder-For-Hire)

The United States Attorney charges that:

Between on or about September 24, 2003, and December 9,
2003, in the District of Massachusetts and elsewhere,

ROBERT RAMOS

defendant herein, with intent that the murder of the mother of
his child be committed in violation of the laws of the
Commonwealth of Massachusetts, did knowingly and intentionally
use and cause to be used facilities in interstate commerce, that
is, telephone and cellular phones, to further plans to murder an
individual, to wit, the mother of his child, as consideration for
a promise and agreement to pay things of pecuniary value, that
is, money paid and to be paid to an individual to commit murder.

All in violation of Title 18, United States Code, Sections
1958 and 2.

COUNT TWO: (Title 18, United States Code, Section 1958 - Interstate Travel In The Commission Of Murder-For-Hire)

The United States Attorney further charges that:

On or about October 20, 2003, in the District of Massachusetts and the District of Rhode Island

ROBERT RAMOS

defendant herein, with intent that the murder of the mother of his child be committed in violation of the laws of the Commonwealth of Massachusetts, traveled in interstate commerce from the Commonwealth of Massachusetts to the State of Rhode Island to discuss plans to murder an individual, to wit, the mother of his child, as consideration for a promise and agreement to pay things of pecuniary value, that is, money paid and to be paid to an individual to commit murder.

All in violation of Title 18, United States Code, Sections 1958 and 2.

COUNT THREE: (Title 18, United States Code, Section 1958 -
Interstate Travel In The Commission Of Murder-For-Hire)

The United States Attorney further charges that:

On or about December 9, 2003, in the District of
Massachusetts and the District of Rhode Island

ROBERT RAMOS

defendant herein, with intent that the murder of the mother of
his child be committed in violation of the laws of the
Commonwealth of Massachusetts, traveled in interstate commerce
from the Commonwealth of Massachusetts to the State of Rhode
Island to discuss plans to murder an individual, to wit, the
mother of his child, as consideration for a promise and agreement
to pay things of pecuniary value, that is, money paid and to be
paid to an individual to commit murder.

All in violation of Title 18, United States Code, Sections
1958 and 2.

NOTICE OF ADDITIONAL FACTORS

The United States Attorney further alleges that:

1. A two-level upward adjustment is warranted pursuant to U.S.S.G. §3B1.3 because Defendant abused a position of private trust and used a special skill in a manner that significantly facilitated the commission or concealment of the offenses with which he is charged.

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By: EMILY R. SCHULMAN
Assistant U.S. Attorney

Date: _____